



October 25, 2022

Honorable Nancy Joseph
United States District Court, Eastern District of Wisconsin
517 East Wisconsin Avenue
Milwaukee, Wisconsin 53202

RE : Remaining Issues Regarding Discovery

Dear Judge Joseph,

Please accept this letter as an update to discovery issues in compliance with the Courts' Order in ECF 214. Since the court hearing of October 7, 2022, Plaintiffs arranged a meet and confer on October 14, 2022. Since that meeting there have been no further requests to meet by either party.

As Plaintiffs communicated to the court on 10/7/22 unfortunately we have not received any text messages from the five specific phones as communicated to Defendants relevant to Plaintiffs 1st, 2nd, 11th, and 13th Claims for Relief. Plaintiffs are also potentially missing use of force reports and arrest reports relevant to Plaintiffs 1st, 11th, and 13th Claims for Relief, as well as the names of all persons who have had access or received the Target List relevant to the 2nd Claim for Relief. However, in an effort to move forward Plaintiffs anticipate receiving the above no later than November 6, 2022.

Since the court's hearing, Plaintiffs have provided Defendants supplemental responses to their identified discovery deficiencies, have provided numerous discovery documents with an index to said documents, and will continue to move forward in resolving issues in compliance with Rule 26(e). Plaintiffs are hopeful that parties can resolve the current discovery issues outside the courts intervention.

Warm regards,

MOTLEY LEGAL SERVICES

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